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July 23, 2025

VIA ECF

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED**


John G. Koeltl, U.S.D.J.

7/24/25

**Re: *The Pinkfong Company, Inc. v. 080*/*FGR, et al.*,
Case No. 25-cv-3640 (JGK)
Request to Indefinitely Adjourn the Initial Pretrial Conference**

Dear Judge Koeltl,

We represent Plaintiff The Pinkfong Company, Inc. ("Plaintiff") in the above-referenced action (the "Action").¹ On May 29, 2025, the Court scheduled the Initial Pretrial Conference for July 30, 2025 at 12:00 p.m. For the reasons set forth herein, Plaintiff respectfully requests (1) that the Court indefinitely adjourn the Initial Pretrial Conference, and (2) proposes filing its motion for default judgment against all defaulting Defendants on or before August 14, 2025.

Plaintiff respectfully requests an indefinite adjournment of the Initial Pretrial Conference scheduled for July 30, 2025 at 12:00 p.m. because Defendants, having been served on May 7, 2025, should have filed an Answer or Rule 12 Motion on or before May 28, 2025. To date, Defendants have neither filed with the Court nor served upon Plaintiff any Answer or Rule 12 Motion, nor contacted Plaintiff to indicate any intention of otherwise appearing in the Action. This is Plaintiff's first request to indefinitely adjourn the Initial Pretrial Conference, and given that Defendants are in default, Plaintiff did not seek Defendants' consent. Plaintiff accordingly proposes filing its motion for default judgment by no later than August 14, 2025.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Melissa J. Levine

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff's Complaint or Application.

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